

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

Jose O. Torres,

Plaintiff,

v.

Sher Tremonte, LLP, Justin M. Sher,
Michael Tremonte, Noam Korati Biale,
Anna Maria Estevao, Tor Ekeland Law,
PLLC, Tor Ekeland, Jessica Coonrod,
Argentino Fiore Law Advocacy, LLC,
Jodi Argentino, Celeste Fiore, Frank
Morano,

Defendants.

No. 22-cv-4662

DECLARATION OF FRANK MORANO, ESQ.

I, Frank Morano, of full age, hereby declare:

1. I am an attorney at law of the State of New Jersey, and a former employee of Defendant, Argentino Fiore Law & Advocacy, LLC, misplead as Argentino Fiore Law Advocacy, LLC (“the Argentino Fiore firm”). I make this Declaration on personal knowledge and in support of the Argentino Fiore firm’s motion for summary judgment.¹

2. I have no relationship with, professional or otherwise, or connection to, any of the other defendants in this matter, with the exception of the individual identified in plaintiff’s complaint as my former client, “Anant S.” (“Anant”). However, I no longer have any relationship with Anant, as Anant decided to terminate our representation of them.

3. Contrary to plaintiff’s representations, neither I nor the Argentino Fiore firm, ever entered into any type of agreement with Anant to “collect criminal debt derived

¹ The Argentino Fiore firm is currently in the process of dissolution.

from” prostitution. The Argentino Fiore firm has provided representation to victims of sexual assault and sexual abuse (including Anant, who happened to be a former sex worker), but has never solicited or advertised for the collection of any illegal debts owed to sex workers. Part of my representation in this particular case was interacting with federal prosecutors to secure Anant’s cooperation with the federal government’s investigation and pursuit of criminal charges against plaintiff. This, however, did not involve the pursuit of any monetary claims on behalf of Anant.

4. The allegations in the criminal case against plaintiff make clear that plaintiff was a prolific utilizer of the services of prostitutes who traveled from out of state to engage in sex acts with plaintiff in New Jersey. Anant is only one of the victims of this scheme identified in plaintiff’s case, and is referred to specifically by plaintiff in his Amended Complaint in this action.

5. While the Argentino Fiore firm had intended to provide professional support to Anant during the pendency of the criminal case against plaintiff, Anant has now terminated their relationship with myself and the Argentino Fiore firm. I do not currently represent Anant in any matter, and have no intent to provide any further legal services to Anant. Additionally, Anant never made any payment to the Argentino Fiore firm for any legal services provided.

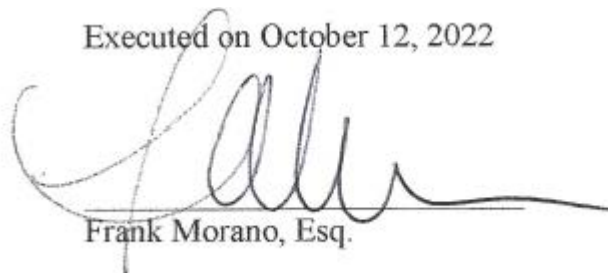
6. Neither of the two partners (and co-defendants in this action) of the Argentino Fiore firm, Jodi Argentino, Esq., and Celeste Fiore, Esq., ever provided any services to or representation of, Anant. No action was ever filed by myself or the Argentino Fiore firm against plaintiff, and none is contemplated.

7. During the course of our representation of Anant, I spoke with Assistant U.S. Attorney Emma Spiro, one of the prosecutors working on plaintiff's criminal case. I may have spoken to one of the other attorney-defendants in this action, but had no agreements with, and did not engage in any conspiracy with, the co-defendants to take any action against plaintiff. As stated, no actions were ever taken against or directed at plaintiff.

8. Other than reciting at length the provisions of various federal criminal statutes, there is no evidence contained in plaintiff's complaint which would provide any basis for the prosecution of plaintiff's civil RICO claims. I specifically note that one of the remedies sought by plaintiff is the discontinuation of the firm's relationship with Anant. Because that relationship has already ended, plaintiff's request is moot. Furthermore, while I am no longer employed with the firm, it is my understanding that the firm is currently dissolving for reasons unrelated to this matter.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 12, 2022



Frank Morano, Esq.